

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
(Indianapolis Division)**

**RED BARN MOTORS, INC.,  
PLATINUM MOTORS, INC., and  
MATTINGLY AUTO SALES, INC.,  
individually, and on behalf of other  
members of the general public  
similarly situated,**

**V.**

**NEXTGEAR CAPITAL, INC.,  
F/K/A DEALER SERVICES  
CORPORATION,**

**DOCKET NO. 1:14-cv-01589-TWP-DLP**

**CLASS ACTION**

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I, Nellwyn Voorhies, declare:

1. I am the Executive Director of Donlin, Recano & Company, Inc. (“Donlin Recano”), an administrative services firm that specializes in the administration of class action matters and large Chapter 11 cases, whose offices are located at 6201 15<sup>th</sup> Avenue, Brooklyn, New York 11219. I submit this declaration (the “Declaration”) in support of the application (the “Application”) for an order appointing Donlin Recano as Class Action Noticing and Settlement Administrator for Jones, Swanson, Huddell & Garrison L.L.C. and its co-counsel for the Red Barn Motors, Inc. et al vs. NextGear Capital Inc. matter (the “Client”) pending under the above caption in the United States District Court for the Southern District of Indiana. Except as otherwise noted, I have personal knowledge of the matters set forth herein.

2. Donlin Recano will perform, at the request of the Client, any noticing and claims related services, including but not limited to maintaining an informational website, answering telephone and email inquiries regarding the class notice and opt out process, researching and locating potential class members, and

sending class notice to class members. In addition, at the Client's request, Donlin Recano will perform such other noticing, claims, administrative, technical, and support services necessary .

3. Donlin Recano has extensive experience in claims notice and administration. For the last 30 years we have noticed millions of claimants, in nearly every country in the world, and we've successfully administered billions of dollars in claims. We have provided substantially similar services in other class action settlements, including, among others:

- Campus Crest Communities, Inc. – Shareholder Class Action Noticing and Settlement Administrator
- Capital Bank Financial Corp. – Shareholder Class Action Noticing and Settlement Administrator
- CCI Student Trust – Noticing and Communications agent
- Celgene Corporation – Shareholder Class Action Noticing and Settlement Administrator
- CytRx Corporation – Shareholder Class Action Noticing and Settlement Administrator
- EZ Corp – Shareholder Class Action Noticing and Settlement Administrator
- Krispy Kreme Doughnuts, Inc. – Shareholder Class Action Noticing and Settlement Administrator
- Leucadia National Corporation – Shareholder Class Action Noticing, Distribution and Settlement Administrator
- Ocean Shore Holding Co. – Shareholder Class Action Noticing and Settlement Administrator
- Pascack Bancorp – Shareholder Class Action Noticing and Settlement Administrator
- Peregrine Semiconductor Corp. – Shareholder Class Action Noticing and Settlement Administrator
- Quality Distribution Inc. – Shareholder Class Action Noticing and Settlement Administrator

4. Donlin Recano responded to a detailed request for proposal from the Client in arriving at its fee structure for this engagement. Donlin Recano will be paid in accordance with the Fee schedule attached hereto as Schedule A. Donlin

Recano does not charge any premium on postage or publishing costs, they simply pass on those costs without mark-up.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 26, 2020, at Del Mar, California.



NELLWYN VOORHIES

**SCHEDULE A****Billing Rate and Cost Information**

<b>Professional Service</b>		<b>Hourly Rates</b>
Senior Consultant		\$175
Technology/Programming Consultant		\$110
Consultant/Analyst		\$90
Phone operators		\$65
Clerical		\$45
<b>Noticing Service</b>		
Laser Printing/ Photocopies		\$.08 per Page
Personalization/ Labels		\$.05 per addressee
Fax Noticing		\$.08 per Page
Postage and Overnight Delivery		At Cost
Electronic Noticing		WAIVED
Publication Services		At Cost
<b>Distribution Services</b>		
Check Processing Fee		\$1.50 per Check
1099 Form Issuance Fee		\$2.00 per 1099 Form
<b>Class Action Administrative Management</b>		
Website Development		WAIVED
Web Hosting		WAIVED
Class Member Data Storage/ Electronic Document Storage (PDF/JPG)		WAIVED
Document Imaging		\$.08 per Image
<b>Data Room Services</b>		
DRC DocuLinks™ Virtual Data Room Services		Hosting WAIVED
Data Room Development		\$90 per Hour
<b>Miscellaneous</b>		
Out-of-Pocket Expenses (including any required travel)		At Cost
Unanticipated Tasks		To be mutually agreed upon prior to performance